

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICHARD KATZ	:	
Plaintiff	:	CIVIL ACTION
v.	:	NO. 3:15-cv-1187
NATIONAL BOARD OF MEDICAL	:	(MARIANI, J.)
EXAMINERS, et al.,	:	(SAPORITO, M.J.)
Defendants	:	

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER**

Defendants, the National Board of Medical Examiners (NBME) and the Federation of State Medical Boards (FSMB), oppose Plaintiff's Motion for Protective Order (Document 80 on the Court's Docket).

Plaintiff's Motion for Protective Order (Document 80) addresses the same issues that were covered in Defendants' Motion To Overrule Plaintiff's Objections to Defendants' Proposed Subpoenas, to Require Plaintiff to Sign Authorizations, and for a Protective Order Regarding Plaintiff's Request for Personnel Files of Defendant NBME's Employees (Document 79 on the Court's Docket), a complete copy of which is attached hereto as Exhibit A.

Accordingly, for the reasons set forth in Defendants' Motion to Overrule Objections (Exhibit A), defendants oppose Plaintiff's Motion for Protective Order.

RESPECTFULLY SUBMITTED,

/s/ Michael E. Sacks

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**CERTIFICATE OF SERVICE**

I certify that the foregoing Opposition of Defendants, the National Board of Medical Examiners and the Federation of State Medical Boards, to Plaintiff's Motion for Protective Order, is being filed electronically with the Clerk of the Court on January 29, 2016, using the electronic case filing system, which will automatically send email notifications of such filing to registered parties. This motion is also being served by electronic mail and regular mail upon:

Richard Katz  
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*Pro se*

/s/ Michael E. Sacks  
Michael E. Sacks